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March 25, 2013

**VIA HAND DELIVERY**

Honorable Martin Glenn  
United States Bankruptcy Judge  
United States Bankruptcy Court  
for the Southern District of New York  
One Bowling Green  
New York, New York 10006

Re: *In re Residential Capital, LLC, et al.*, Case No. 12-12020 (MG),  
*Residential Capital, LLC et al. v. Allstate Insurance Co., et al.*,  
Adv. Proc. No. 13-01262 (MG)

Dear Judge Glenn:

We are counsel to AIG Asset Management (U.S.), LLC, Allstate Insurance Company, Massachusetts Mutual Life Insurance Company, and Prudential Insurance Company of America in connection with the above-referenced jointly administered cases and adversary proceeding.

We write concerning scheduling of the summary judgment hearing in the adversary proceeding. During the March 19, 2013 status conference before Your Honor, you indicated that the Court would adopt the briefing and hearing schedule set forth in the parties' joint status letter dated March 6, 2013. This joint letter proposed a hearing on the summary judgment motions be held on Tuesday, May 14, 2013, an omnibus hearing date, subject to the Court's availability.

I am currently scheduled to commence a major fraudulent conveyance trial (GPMI v Lukoil) before Judge Chapman on May 14, 2013. I had erroneously believed that the first day of trial would be limited to pretrial motions concerning experts, and have just been advised that opening argument would commence in that trial on day one. Counsel to the ResCap Debtors have indicated that they have no objection to moving the summary judgment hearing to the week of May 20, 2013, if the Court has time available that week. The rest of the schedule would remain unchanged.

We would be most appreciative if the Court is able to accommodate this scheduling request. We will contact chambers shortly to inquire further, and in the mean time, we are available at the Court's convenience in the event any questions should arise.

Very truly yours,



Susheel Kirpalani

SK/scs